

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIA COALITION FOR WOMEN PRISONERS

V.

NO. 23-CV-4155-YGR

UNITED STATES OF AMERICA

FILED

MAY 17 2024 *g*

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DECLARATION BY MAKASINI LOMU, #25251-081, PURSUANT TO 28 USC SECTION 1742, REPORTING DENIAL OF MEDICAL TREATMENT, EXPOSURE TO TOXIC MOLD AND ASBESTOS CONTAMINATION, AND DENIAL OF SEXUAL ABUSE REPORTING AT FPC-BRYAN

I, Makasini Lomu, #25251-081, certifies under penalty of perjury, that the following statements are true and correct to the best of my knowledge, as follows:

1. I have been in custody at FPC-Bryan since April 12, 2024. I have literally begged for my CPAP machines, because I have sleep apnea, COPD, asthma, and other medical conditions which prevent me from sleeping. The acting-Health Services Administrator continues to tell me she is waiting for FCI-Dublin to send the CPAP machine.
2. Upon my arrival at the prison, I personally witnessed the preparations for an inspection by FBOP officials from the Regional and Central offices, along with the Office of Internal Affairs and the FBI. AICs were instructed to paint over toxic mold contamination. Additionally, floor tiles I believe were made from asbestos were dry buffed.
3. A family friend, JS, was already at FPC-Bryan when I arrived. I did not know she was here. JS was in distress and explained to me, she had been sexually abused by an FBOP employee. JS stated when she tried to file a grievance to report the abuse, she was blocked. A week after I arrived, AIC, Ms. Rhonda Fleming was transferred to FPC-Bryan. I introduced Ms. Fleming to JS, who immediately repeated the same things she told me. Ms. Fleming emailed AUSA Andrew Paulson, to report the sexual abuse and other misconduct at the prison. I personally read the email. Shortly thereafter, JS was seen by the FBI.
4. During an orientation call-out, Warden Hall came to speak to about 14 inmates, to include me and Ms. Fleming. Warden Hall repeated several times, "This is not Dublin." In other town hall meetings, when I was in the RDAP housing unit, Warden Hall continued to state, "This is not Dublin." I have taken this as a form of intimidation.

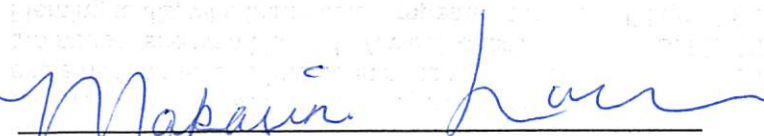
These are facts which can be verified. I am experiencing the same denial of medical treatment, exposure to mold and asbestos, and enduring the emotional strain of hearing about sexual abuse of women. I am sad and broken. I believed it would be different at a camp.

I was denied transfer to home confinement under the CARES Act, I believe, because I reported Officer Ramos for assaulting me and his sexual abuse of women. I had witnessed Ramos and other employees sexually abusing women. Any woman who assisted in reporting sexual abuse, was retaliated against with the denial of transfer to halfway house and/or home confinement. A review of my file will prove this fact. I met all the criteria for the transfer.

I am sending this declaration in support of any relief the class attorneys or the special master are working to obtain for me and other class members. I have read the Court's order, Docket Entry 300. I believe it is important for the special master to look into FPC-Bryan's blocking of the reporting of sexual abuse, denial of medical treatment, and toxic mold and asbestos contamination.

I will not waste the Court's time with made up stories. I pray the Court will immediately request my medical records to verify I have used a CPAP machine for years. Send the special master and/or building inspectors to verify the mold and asbestos contamination. Check with AUSA Andrew Paulson to verify the email from Ms. Fleming and the action taken AFTER, the email was sent, in reference to JS sexual abuse.

I am reporting verifiable, factual events.


Makasini Lomu
Declarant, May 13, 2024

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